

**STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION  
DOCKET NO. 2019-224-E  
DOCKET NO. 2019-225-E**

In the Matter of:

South Carolina Energy Freedom Act (House  
Bill 3659) Proceeding Related to S.C. Code  
Ann. Section 58-37-40 and Integrated  
Resource Plans for Duke Energy Carolinas,  
LLC and Duke Energy Progress, LLC

---

**CAROLINAS CLEAN ENERGY  
BUSINESS ASSOCIATION'S FIRST  
SET OF INTERROGATORIES TO  
DUKE ENERGY CAROLINAS, LLC  
and DUKE ENERGY PROGRESS, LLC.**

Pursuant to S.C. Code Ann. Regs. 103-833, the Carolinas Clean Energy Business Association (“CCEBA”), by and through its undersigned counsel, hereby submits this First Set of Interrogatories to Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP”) (together with DEC, “Duke Energy” or “the Companies”). Pursuant to South Carolina Rule of Civil Procedure 26 and Commission regulations, each request is continuing until the time of the hearing such that the Companies must promptly transmit to CCEBA, the requested information as it becomes available.

**INSTRUCTIONS**

1. Responses to these requests should be provided to the undersigned, via email, within twenty (20) days of the date of service.
2. All information should be provided to the undersigned in the format requested and under oath.
3. All responses to the below requests should be labeled using the same numbers as used herein.

4. If the requested information is found in other places or in other exhibits, reference shall not be made to those, but instead, the information should be reproduced and placed in the responses to this request in the appropriate sequence.

5. Each request should be reproduced at the beginning of the response thereto.

6. This request shall be deemed continuing so as to require Duke Energy to supplement or amend its responses as any additional information becomes available up to and through the date of hearing.

7. Answer each request on the basis of the entire knowledge of Duke Energy, including information in the possession of Duke Energy or its consultants, representatives, agents, experts, operating divisions, business divisions, assigns, partners, and attorneys, if any.

8. If any request cannot be answered in full, respond to the extent possible and specify the reasons for Duke Energy's inability to respond.

### **DEFINITIONS**

As used herein, the following terms shall have the meaning and be interpreted as set forth below:

1. "You," "your," and "Duke Energy" or "the Companies" mean DEC, DEP or any of their affiliates, officers, directors, employees, attorneys, predecessors, successors, officers, directors, agents, and other persons acting in their behalf.

2. "Modified IRP" is defined as the Modified Integrated Resource Plans filed by the Companies on August 27, 2021.

3. "Communication(s)" when used in these Requests shall include the transmittal of information by any means, written, oral, electronic or otherwise.

4. When used in referenced to a document, "identify," identity," and "identification" mean to state the type of document (e.g., computer-stored information, microfilm, letter, memorandum, policy circular, minute book, telegram, chart, etc.), or some other means of identifying it, and its present location and custodian. If any such document was, but no long is, in your possession or subject to your control, state what disposition was made of the document, and if the document was destroyed or disposed of pursuant to a retention policy, please state the retention policy.

### **INTERROGATORIES**

1. Please refer to Public Service Commission of South Carolina Order 2021-447. Ordering paragraph 6 specifies a number of modifications that the Companies should make to their ELCC methodologies. Please indicate for each subpart of Ordering Paragraph 6 how the Companies incorporated the directive into the Modified IRPs. Also, please indicate the updated ELCC values that were used in the Modified IRP modeling.

#### **RESPONSE:**

2. Please confirm whether the Companies utilized the same modeling software in preparing their Modified IRPs as they did in preparing their original IRP. If denied, please indicate what modeling software was used in preparing the Modified IRPs.

#### **RESPONSE:**

3. **Please refer to Figure 2-B,** “DEC & DEP Portfolio C1 Incremental Solar

Additions” in both Modified IRPs.

- a. For both DEC and DEP, provide a breakdown of annual solar additions by policy directive (e.g. x MW from CPRE, x MW from HB589, etc.).
- b. For capacity listed as “Undesignated Util COS Solar”, please provide the justification or basis for utility ownership of this capacity for each year.
- c. Please explain why some years exceed the 750 MW interconnection limit that was modeled.
- d. Do the Companies believe they will be able to interconnect more than 750 MW per year as indicated in Figure 2-B?
- e. Please confirm whether the 750 MW interconnection limit was binding on the quantity of solar that was added in a given year, and that absent this limit (or if the limit were increased) whether more solar would have been selected by the model.
- f. Please confirm that the model always selected the maximum allowable quantity of \$38/MWh PPA solar.
- g. Please confirm whether the model always selected the \$38/MWh PPA option before it selected utility-owned solar.

**RESPONSE:**

4. Please provide the Levelized Cost of Energy and revenue requirement per MWh of utility-owned solar by year for each year modeled in the Modified IRPs.

**RESPONSE:**

5. Why did the Companies not create a D2, E2, and F2 portfolio consistent with the Commission’s directives to use a modified natural gas and battery cost forecast?

**RESPONSE:**

6. Please refer to Commission Order 2021-447, Ordering Paragraphs 10 and 16.

Given the specific directive from the Commission to use updated natural gas and battery cost forecasts, why did Duke Energy select Portfolio C1, which was based on the Companies' original natural gas and battery cost forecast? Please explain how this selection, rather than selecting Portfolio C2, is consistent with Ordering Paragraphs 10 and 16 of Commission Order 2021-447.

**RESPONSE:**

7. What is the basis for limiting third-party PPAs to only 50% of solar additions?

Please indicate with specificity where the Commission approved this limit in Order 2021-447, or any other policy justification for this limit.

**RESPONSE:**

8. Separately, for both DEC and DEP, please provide the MW of capacity additions forecast

by Portfolio C1 by resource type for each year from 2021 to 2035.

**RESPONSE:**

9. Separately, for both DEC and DEP, please provide the GWh of generation forecast by

Portfolio C1 by resource type for each year from 2021 to 2035.

**RESPONSE:**

10. Do the Companies plan to modify their IRPs as filed in North Carolina to reflect the changes that they made in the Modified IRPs in South Carolina? If not, please include a general discussion of how the Companies will reconcile having two different IRPs for the same system.

**RESPONSE:**

Respectfully Submitted,

/s/Richard L. Whitt  
Whitt Law Firm, LLC,  
401 Western Lane, Suite E  
Irmo, South Carolina, 29063  
(803) 995-7719.

/s/John D. Burns  
General Counsel,  
Carolinas Clean Energy Business Association,  
811 Ninth Street, Ste. 120-158  
Durham, North Carolina 27705  
(919) 306-6906  
Admitted *Pro Hac Vice*.

*Both as Counsel for Intervenor, Carolinas Clean Energy Business Association.*

September 28, 2021